

ENCLOSURE

**SANTA BARBARA COUNTY
AIR POLLUTION CONTROL DISTRICT
STAFF REPORT**

**Proposed Amendments
Rule 401 (Agricultural and Prescribed Burning)**

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**26 Castilian Drive, B-23
Goleta, CA 93117
805.961.8800
Fax 961.8801**

APCD Contacts

**Craig Strommen, 805.961.8822, StrommenC@sbcapcd.org
Bette Easton, 805.961.8898, EastonB@sbcapcd.org**

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STAFF REPORT
PROPOSED AMENDMENTS TO RULE 401
(Agricultural and Prescribed Burning)

1.0 Executive Summary

The intent of this rule amendment is to implement the “Smoke Management Guidelines for Agricultural and Prescribed Burning” (Guidelines) that were adopted by the California Air Resources Board on March 13, 2001. The purpose of these Guidelines is to reduce smoke impacts resulting from agricultural and prescribed burning. While smoke management efforts in Santa Barbara County are generally successful, it is important that infrequent but serious smoke episodes not occur. Santa Barbara County Air Pollution Control District (APCD) Rule 401 currently implements the California Air Resources Board’s 1987 Agricultural Burning Guidelines. While the APCD has implemented the March 13, 2001 revisions, the Guidelines, as updated in 2001 with the new requirements, are not reflected in current Rule 401 (Agricultural Burning). The APCD is therefore proposing to amend Rule 401.

Generally, agricultural burning refers to the intentional use of fire associated with the growing of crops or raising of fowl or animals. Prescribed burning is also a form of agricultural burning, but is conducted to meet specific land management objectives such as the reduction of flammable fuels or to assist in the restoration of the ecosystem health and habitat. The changes proposed in Rule 401 affect mostly prescribed burning activities.

The proposed rule amendment is intended to achieve the following objectives:

- Implement the California Air Resources Board revisions to the Smoke Management Guidelines;
- Minimize or prevent smoke impacts to protect public health and welfare, including the protection of visibility;
- Establish a collaborative relationship between the APCD and burners that increases the effectiveness of the smoke management program, and;
- Provide increased opportunities for prescribed burning to reduce fuel loads and potentially catastrophic wildfires, and on agricultural lands to allow crop waste to be removed without adverse air quality impacts.

Implementation of Smoke Management Guidelines: The APCD has implemented its smoke management program in concert with the California Air Resources Board and affected land managers within the County who routinely conduct prescribed burns such as the County Fire Department, Vandenberg Air Force Base and the United States Forest Service. The proposed amendments to Rule 401 are intended to incorporate the new Smoke Management Guidelines as an enforceable element of the APCD’s smoke management program.

About 2350 acres were treated in 2001 in Santa Barbara County using prescribed burning. Future projections made by burners would increase the total to about 6250 acres in 2003. While the amount of prescribed burning conducted during any given year is primarily governed by fiscal constraints, it is important that the APCD be in a position to efficiently and effectively manage all agricultural and prescribed burning activities. Incorporation of the new Guidelines into Rule 401 will provide the APCD with the tools to achieve this objective.

Minimize Smoke Impacts to the Public: Under current Rule 401, the APCD plays the lead role in making decisions for specific prescribed burns, e.g., the timing, location, and amount of prescribed burning that can be authorized without an adverse public health or air quality impact. The proposed amendments to Rule 401 enhance the APCD's ability to manage both agricultural and prescribed burning activities in a manner that will minimize smoke impacts to the public.

One of the principal new provisions of amended Rule 401 is a Daily Burn Authorization System. Under the proposed Rule, all prescribed burns must receive authorization to burn from the APCD each and every day burning is being conducted. Implementation of a daily burn authorization will provide the APCD with a smoke management tool to better ensure that the timing, location and amount of prescribed burning allowed on any day will not result in smoke impacts to the public. A complementary provision to the use of a daily burn authorization system for prescribed burning is also being included in amended Rule 401 for general agricultural and residential burning. This new provision would prohibit general agricultural burning and residential burning on any day that prescribed burning is authorized and on any day classified by the Air Resources Board as a "marginal burn day". A "marginal burn day" is a new provision that had been adopted by the Air Resources Board that provides for a limited amount of agricultural burning to be conducted as authorized by the local district. Since the APCD is proposing to implement a daily burn authorization program for prescribed burning only and not general agricultural burning, disallowing general agricultural and residential burning on those days prescribed burning is taking place or during a marginal burn day will help to minimize smoke impacts to the public. Also, restricting the Daily Burn Authorization System to only prescribed burning will reduce the cost of implementation and obviate the need to generate revenue through increased fees.

Establish Collaborative Relationship with Burners: Proposed amended Rule 401 will foster the need for the APCD and prescribed burners to strengthen their existing working relationships to achieve their respective goals. Under proposed amended Rule 401, prescribed burners are required to submit a Smoke Management Plan and obtain APCD approval of the Plan prior to conducting any burning. Smoke management plans describe in detail the burn plan that will be implemented to achieve the resource objectives of the prescribed burn and the practices that will be observed to ensure that smoke impacts associated with the burn, if any, are reduced to the maximum extent possible. Since burn requests will be approved on a first come, first served basis, all burn agencies, the APCD, and adjacent districts must effectively communicate with each other

to ensure that the timing, location and amount of burning taking place on a given day does not cause smoke impacts to the public.

Increase opportunities for burning:

Proposed amended Rule 401 will help to maximize the amount of burning that can take place while still avoiding smoke impacts by proposing a new concept – marginal burn days. The Guidelines allow the California Air Resources Board to designate each day as a “burn” day, a “no burn” day, or a “marginal burn” day for each air basin. The concept of a marginal burn day designation for Santa Barbara County would enable the APCD to allow limited amounts of prescribed burning in specified areas (e.g., a small portion of Santa Barbara County) when the burning will not cause or contribute to air quality problems. While no agricultural or residential burning will be allowed on a marginal burn day, prescribed burn opportunities should increase without a public health impact.

2.0 Introduction/Background

In March 2001, the California Air Resources Board amended California’s Agricultural Burning Guidelines. The Guidelines were established in 1971 in response to statewide legislation in 1970 that recognized the need to reduce the harmful effects of smoke from controlled burning and unrestrained wildfires on public and private lands.

Generally, agricultural burning refers to the intentional use of fire associated with the growing of crops or raising of fowl or animals. Prescribed burning is also a form of agricultural burning, but is conducted by a land manager to meet specific land management objectives such as the reduction of flammable fuels or to assist in the restoration of the ecosystem health and habitat. The changes proposed in Rule 401 affect mostly prescribed burning activities.

At present, smoke management efforts in Santa Barbara County are generally successful at avoiding smoke impacts to people. The challenge is to ensure that infrequent but serious smoke episodes do not occur. Additional efforts are also needed to address expected parallel increases in prescribed burning and population growth, especially in rural areas. The combination of these two phenomena makes it critical that Santa Barbara County’s smoke management program be as technically sound and effective as possible.

In order to implement the California Air Resources Board’s recent revision of the Agricultural Burning Guidelines, the APCD is proposing to amend Rule 401 (Agricultural Burning). Rule 401 was first adopted in October 1971, and has been amended twice since; in October 1978 and in October 1990.

2.1 What are the objectives of the proposed amendments to Rule 401?

The proposed rule amendment is intended to achieve the following objectives:

- Implement the California Air Resources Board revisions to the Smoke Management Guidelines;
- Minimize or prevent smoke impacts to protect public health and welfare, including the protection of visibility;
- Establish a collaborative relationship between the APCD and burners that increases the effectiveness of the smoke management program, and;
- Provide increased opportunities for prescribed burning to reduce fuel loads and potentially catastrophic wildfires, and on agricultural lands to allow crop waste to be removed without adverse air quality impacts.

2.2 What would the proposed amendments to Rule 401 do?

The proposed amendments would not change or eliminate any needed burning, but may change the timing, location, and amounts of vegetative burning authorized on any particular day. The proposed amendments place primary emphasis on smoke management through improved planning, collaboration, and consultation between burners, the APCD, and the California Air Resources Board.

The proposed amendments contain three new basic provisions: requirements for a “burn authorization system”; requirements for a “smoke management plan”; and provisions for the use of a “marginal” burn day.

Burn Authorization System: The APCD is proposing a daily “burn authorization system” for prescribed burning. This system describes how meteorological and pollutant information is collected, staff resources to be used, and other procedures to operate the program. The APCD will make decisions on a daily basis regarding how much burning to allow, and where and when it should be allowed. The amount of burning allowed on each day will be consistent with meteorological conditions and pollution levels on that day. On those days with good vertical mixing, more burning can be allowed since those conditions will be more favorable for smoke dispersal. On more stagnant days, less burning or no burning will be allowed. Agricultural and residential burning will be prohibited on days when prescribed burning is authorized and on “marginal burn” days.

Smoke Management Plan: Prescribed burners will have to prepare a “smoke management plan” for each prescribed burn. The plan will then be reviewed and approved by the APCD before a prescribed burn can take place. The plans must contain information about the amount of material, how long the burn would be expected to take, and where the smoke from the burn would be expected to travel under the meteorological conditions desired for burning. Where larger prescribed burns are proposed, the plan must contain a discussion of alternatives to burning. Contingency plans must be included describing actions to be taken if meteorological conditions change or smoke impacts occur. Most agricultural burns used to dispose of vegetative waste from the growing of crops will not require smoke management plans.

Marginal burn day: On a marginal burn day, some limited prescribed burning in specified areas may be authorized by the APCD on days when limited amounts of burning would not cause or contribute to air quality problems. This provision should increase burn opportunities without a public health impact. Note that while marginal burn days theoretically provide more opportunities for burning on days that would otherwise be no burn days, burning on marginal burn days is burning that would take place on some other day.

3.0 Basis for Rule Amendment

The APCD is proposing changes to Rule 401 (Agricultural Burning) for several reasons:

- Improvements are needed to the existing rule to allow Santa Barbara County to implement the Title 17 Smoke Management Guidelines as revised by the California Air Resources Board on March 13, 2001.

Emissions from agricultural burning, including prescribed burning, have the potential to significantly affect air quality and public health.

While air quality in Santa Barbara County is improving, violations of the State PM₁₀ standards continue to occur. Smoke from prescribed burning or wildfires can sometimes result in high ambient particulate levels for several hours. While the duration of these episodes may not be long enough to cause a violation of the 24-hour standard, they nonetheless can be sufficient to affect the health of sensitive individuals, e.g., the elderly, children, and asthmatics.

- Federal and State land managers need to continue and are expected to increase prescribed burning in Santa Barbara County to reduce excess vegetative fuel loadings that heighten the risk of catastrophic wildfires.

Because of the accumulation of vegetative materials on forestlands, incidents of large wildfires have become a more frequent occurrence. In order to restore the natural cycle of low intensity fire on these fire-dependent lands for ecological reasons, land managers plan to increase the number of acres burned in our national forests and wildlands. While fuels management is beneficial for the overall life and health of forestlands, burning must be carefully timed and planned to reduce the potential impact on public health and air quality. The proposed rule amendments will require prescribed burners to work more closely with the APCD to avoid burning on days that could pose adverse health impacts due to smoke to an affected population.

- Severe smoke episodes can occur from prescribed burning, but can be avoided with an approach that relies upon closer communication and collaboration between the APCD and prescribed burners.

While only five complaints related to prescribed burning occurred in Santa Barbara County in the three-year period 1999 – 2001, these fires have caused short-term smoke episodes that might otherwise have been avoided or mitigated. As more people move into rural areas, there will be increasing need to manage prescribed burning activities on neighboring public lands (wildland/urban interface areas) to avoid public health impacts. The proposed amendments to Rule 401 will require burners to work with the APCD in an enhanced coordination and consultation process from the initial planning and scheduling phase through the post-burn evaluation.

The proposed rule amendments are needed to ensure that public health and air quality standards are taken into account in the face of expected increases in prescribed burning.

4.0 Discussion of Proposed Rule Amendments

The proposed amendments to Rule 401 (Agricultural Burning) are intended to enhance the APCD's existing smoke management program by emphasizing greater collaboration with stakeholders to protect air quality and public health from smoke impacts resulting from prescribed burning on forest and rangelands.

The key features of the proposed changes can be summarized as follows:

- Implement APCD smoke management program using air quality and meteorological data to determine when and where prescribed burning can be conducted with minimal smoke impacts.
- Require smoke management plans to be prepared by prescribed burners for review and approval by the APCD before burning is conducted.
- Require advanced planning and consultation between prescribed burners, the APCD, and the California Air Resources Board to ensure greater emphasis on preventing or reducing smoke impacts to sensitive populations from prescribed burning.
- Use improved meteorological data and tracking techniques to accommodate necessary increases in prescribed burning.
- Increase consideration of alternative non-burn treatments to prescribed burning.

4.1 Proposed Amendments to Rule 401

The title of the rule is changed to include prescribed burning, thus the amended rule will be titled "Agricultural and Prescribed Burning." This title change

reflects the title of the California Air Resources Board's Smoke Management Guidelines for Agricultural and Prescribed Burning.

Table 1 provides a subject location comparison of proposed amended Rule 401 and the California Air Resources Board's Smoke Management Guidelines for Agricultural and Prescribed Burning (Title 17).

Section A – Applicability This section is changed to reflect that forest management, range improvement, and wildland vegetation management are all forms of prescribed burning.

Section B – Definitions This section is replaced in its entirety with the definitions in the revised California Air Resources Board's Smoke Management Guidelines for Agricultural and Prescribed Burning, excepting definitions of "region" and "range improvement."

Section C – General Requirements – Agricultural and Prescribed Burning This section is presently titled "Requirements." Existing language is proposed to be deleted and/or changed to reflect the language in the California Air Resources Board's Smoke Management Guidelines for Agricultural and Prescribed Burning.

Burn Permits language in proposed Rule 401 is essentially that found at §80120 of the Guidelines; and specifically requires a permit for any burning, with conditions specifying when burning can take place.

Registration and Reporting language in proposed Rule 401 is essentially that found at §80130 of the Guidelines and requires land managers or other burners to register their planned burn projects with the APCD. Designated agencies authorized to issue agricultural and prescribed burning permits are required to report the tonnage or acreage burned each year by February 1st of each year.

Permissive-Burn, Marginal Burn, or No-Burn days language in proposed Rule 401 is essentially that found at §80110 of the Guidelines and specifies how the California Air Resources Board will designate each day as a permissive, marginal, or no-burn day. Proposed Rule 401 also specifies that agricultural and residential burning are prohibited on any day during which prescribed burning is authorized and on any marginal burn day.

Daily burn Authorization language in proposed Rule 401 is essentially that found at §80145(a) of the Guidelines and specifies that in order to obtain a burn authorization, a prescribed burn operator must submit an APCD-approved smoke management plan. The elements of the smoke management plan and other conditions for daily burn authorizations are detailed.

Section D – Special Requirements – Prescribed Burning and Prescribed Fires in Wildland and Wildland/Urban Interface Areas This section is presently titled

“Requirements – Wildland Vegetation Management Burning. Existing language is proposed to be replaced in its entirety by language at §80160 of the California Air Resources Board’s “Smoke Management Guidelines for Agricultural and Prescribed Burning.

Smoke management plan elements for all burn projects, for projects greater than 10 acres, for projects greater than 100 acres, projects greater than 250 acres, projects near smoke sensitive areas, multi-day projects, and options for natural ignition situations are specified. Requirements are also specified for smoke management evaluations for projects larger than 250 acres.

Section E – Meteorological Criteria for Regulating Agricultural and Prescribed Burning This section has been titled “Enforcement Procedures.” Existing language is proposed to be replaced, incorporating by reference §80210 of the Guidelines.

TABLE 1. COMPARISON OF TITLE 17 AND APCD RULE 401

REQUIREMENT	TITLE 17	APCD RULE 401
Scope and Applicability	§80102. Scope and Applicability	A. Applicability
Definitions	§80101. Definitions	B. Definitions
-Agricultural Burning	§80101 (a)	See Rule 102
-Air Pollution Control District	§80101 (b)	See Rule 102
-Air Quality	§80101 (c)	B.1
-Ambient Air	§80101 (d)	B.2
-Burn Plan	§80101 (g)	B.3
-Burn Project	§80101 (h)	B.4
-Class 1 Area	§80101 (i)	See Rule 102
-Designated Agency	§80101 (j)	B.5
-Fire Protection Agency	§80101 (k)	B.6
-Forty-eight hour forecast	§80101 (l)	B.7
-Land manager	§80101 (m)	B.8
-Marginal burn day	§80101 (n)	B.9
-National Ambient Air Quality Standards (NAAQA)	§80101 (o)	See Rule 102

REQUIREMENT	TITLE 17	APCD RULE 401
-Ninety-six hour trend	§80101 (p)	B.10
-No-burn day	§80101 (q)	B.11
-Open burning	§80101 (r)	See Rule 102
-Particulate matter (PM)	§80101 (s)	See Rule 102
-Permissive-burn day	§80101 (t)	B.12
-Pre-fire fuel treatment	§80101 (u)	B.13
-Prescribed burning	§80101 (v)	B.14
-Prescribed fire	§80101 (w)	B.15
-Range improvement burning	§80101 (x)	NA
-Region	§80101 (y)	NA
-Residential burning	§80101 (z)	B.16
-Seventy-two hour outlook	§80101 (aa)	B.17
-Smoke Management Plan	§80101 (bb)	B.18
-Smoke management prescription	§80101 (cc)	B.19
-Smoke management program	§80101 (dd)	B.20
-Smoke sensitive areas	§80101 (ee)	B.21
-State ambient air quality standard	§80101 (ff)	See Rule 102
-Wildfire	§80101 (gg)	B.22
-Wildland	§80101 (hh)	B.23
-Wildland fire	§80101 (ii)	B.24
-Wildland/urban interface	§80101 (jj)	B.25
Permissive-Burn, Marginal Burn, or No-burn days	§80110	C.3

REQUIREMENT	TITLE 17	APCD RULE 401
Burning Permits	§80120	C.1
Burning Report	§80130	C.2
Daily Burn Authorization	80145(a)	C.4
Special Requirements for Open Burning in Agricultural Operations in the Growing of Crops or Raising of Fowl or Animals.	§80150	NA
Special Requirements for Prescribed burning and Prescribed Fires in Wildland and Wildland/Urban Interface Areas	§80160	D.
Exemptions	§80170	NA
Meteorological Criteria for Regulating Agricultural and Prescribed Burning	§80210	E.

5.0 Emission Impacts of the Rule Amendments

The proposed amendments to Rule 401 will provide a long-term net air quality benefit by increasing opportunities for prescribed burning and thereby reduce the likelihood of wildfires that would generate a far greater amount of air pollution. While the rule amendments will not result in any more or any less burning in any given year, by providing the APCD with greater control over the timing, the acreage, and who is authorized to conduct prescribed burning on any given day, there is greater assurance that air quality impacts will be minimized.

However, emissions from agricultural burning and prescribed fires do have the potential to significantly impact air quality and public health. Smoke contains many potentially harmful air pollutants. More than 200 chemicals and compounds can be found in smoke,

including carbon dioxide, oxides of nitrogen, a variety of toxic hydrocarbons and other organic compounds in the form of particulate matter. In addition, emissions from vegetative burning include large amounts of particulate matter.

5.1 Smoke and Particulate Matter in Santa Barbara County

Particulate matter is a complex mix of pollutants such as smoke, dust, nitrates, sulfates, and metals. Particles can be directly emitted from sources like vehicles, fires, and dust from roads, or it can be formed in the atmosphere by the reaction of chemical precursors, like oxides of nitrogen and ammonia. Incomplete combustion from open burning generally forms fine particles, while mechanically formed particles such as dust tend to be larger.

In Santa Barbara County the State's 24-hour PM₁₀ standard (50 micrograms per cubic meter) was exceeded on three occasions in 1999 and on three occasions in 2000. The county is in attainment of the federal PM₁₀ standard. A "Particulate Matter Emission Reduction Study" conducted by the APCD in 1990 found that geological dust, largely comprised of re-entrained road dust, and car exhaust are the primary manmade contributors to ambient concentrations of PM₁₀ in Santa Barbara County.

Smoke from planned or unplanned fires can sometimes result in short-term (several hour) episodes of high particulate levels. In some cases, these episodes do not cause violations of the 24-hour particulate matter standards, but very high hourly levels cause people to complain about smoke affecting them.

Although these short-term episodes may not trigger violations of particulate matter air quality standards, they are nonetheless a public health concern. Through more effective smoke management practices countywide, the APCD hopes to prevent the occurrence of such short-term episodes.

6.0 Fiscal Impact of Rule Amendment

The APCD has identified the following financial and economic impacts of the proposed amendments to Rule 401, including those for fire management agencies and the private sector.

6.1 Costs

The APCD The APCD's fee schedule does not recover costs for administering current agricultural burning requirements. There are no fees charged by the APCD for application and use of a permit for agricultural or prescribed fires. Fire departments, who administer burn permit programs for both air quality and safety purposes, do charge nominal fees for burn permits. The program enhancements in proposed amendments to Rule 401 will likely result in some additional costs for

program administration and oversight, including increased coordination and consultation with burners, and determining the timing and amounts of specific burns, particularly in those areas that will face significant increases in prescribed burning. However, since the level of effort is not expected to be significantly greater than that currently expended in similar activities, the APCD is not proposing a fee increase at this time. If in the future a significant increase in level of effort is needed to enforce Rule 401, the APCD will return to the Board of Directors with a proposal to increase funding.

Fire Districts In Santa Barbara County, fire districts perform the dual duties of burn permit agencies and prescribed burners. There may be some additional costs to the fire protection agencies associated with burn plan monitoring and reporting requirements contained in proposed Rule 401.

Federal Land Managers and the U.S. Military Many of the prescribed burns conducted by the federal land managers, including the U.S. military that manage prescribed burning at military installations in California, are likely to be greater than 100 acres. Under proposed Rule 401, federal smoke management plans would need to include specific contingency actions that would be taken if smoke impacts occur or conditions deviate from the approved prescription. If a project is expected to burn more than 250 acres or if a burn is expected to continue overnight or over several days near smoke sensitive areas, the smoke management plan would also be required to include appropriate project monitoring as determined by the APCD. For these federal agencies, there may be costs due to cancellation for a burn project on the day of the burn, increased coordination during burn authorization, or from other aspects of the program such as public notification.

Crop Waste and Grazing Operations Proposed amended Rule 401 will not substantially change requirements governing burning used for crop waste or grazing operations. However the smoke management program will require greater coordination between prescribed and agricultural burners. Agricultural burning is prohibited on days when prescribed burning is scheduled and on any day that is declared a “marginal burn” day. Consequently, there may be costs associated with the increased coordination required with the APCD and other agencies. There may also be costs due to cancellation for a burn project on the day of the burn.

7.0 CEQA

A Negative Declaration was prepared in compliance with Section 21080 (c) (1) of the California Environmental Quality Act and is presented in Attachment 6 to the Board Letter. CEQA Findings are in Attachment 1 to the Board Letter.

8.0 Public Review

The APCD conducted a meeting with stakeholders on August 11, 1999 to discuss proposed amendments to Title 17 of the California Code of Regulations, Subchapter 2, Smoke Management Guidelines for Agricultural and Prescribed burning. Topics discussed included:

- Proposed changes to Title 17 Agricultural Burning Guidelines;
- Schedule for formal public comments/adoption of Title 17;
- Comments by San Luis Obispo, Santa Barbara and Ventura County APCD;
- How the Title 17 changes will affect stakeholders;
- Ventura experience in agricultural burning;
- Solicitation of input/recommendations from fire agencies on proposed Title 17 amendments.

The APCD mailed copies of the Title 17 amendments to prescribed burners on February 9, 2001 and invited them to attend a Title 17 Implementation workshop on March 1, 2001. Topics discussed included:

- APCD policy development;
- Roles and responsibilities of the APCD and designated fire agencies;
- Smoke management plan implementation options, requirements and compliance dates;
- Daily burn allocation program;
- New burn permit issuance and reporting requirements;
- Handling of “burn day” notification and issuance of 48-, 72-, and 96-hour outlooks;
- During the meeting, consensus was reached that no agricultural or residential (backyard) burning will be allowed on days during which prescribed burning is authorized or on days declared to be “marginal burn” or “no burn” days.

The APCD presented proposed amendments to Rule 401 to the Community Advisory Council on March 13, 2002. The proposed rule was unanimously approved by a vote of 12 - 0.

9.0 References

1. Staff Report "Proposed Amendments to California's Agricultural Burning Guidelines." California Environmental Protection Agency, Air Resources Board, February 2000.